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Comment: Dear Sir or Madam:

1

I have reviewed the Draft Environmental Impact Statement (DEIS) on the proposed amendment of the 1998 Northeast National Petroleum Reserve ? Alaska Plan and offer these comments and recommendations to the Bureau of Land Management.

002
Special
Designation

In 1977 the Secretary of the Interior established the Teshekpuk Lake Surface Protection Area and the Colville River Special Area to maintain appropriate environmental protection for fish and wildlife habitat and subsistence resources. The Northeast portion of NPR-A includes the Teshekpuk Lake Surface Protection Area, which contains habitat for wildlife populations of international importance. Teshekpuk Lake has been proposed for a National Wildlife Refuge in the past because it has some of the most productive breeding, staging and brood-rearing habitat for shorebirds and other waterfowl in the entire arctic region of Alaska, including for the Federally-endangered spectacled eider. It is also one of the most important goose and black brant molting areas in North America and provides calving habitat for the Teshekpuk Lake caribou herd. The Colville River Special Area was established to protect raptor and passerine nesting habitats and important foraging areas for moose, grizzly bears, and wolves. Critically important subsistence resources for Nuiqsut and other Native Villages are in both these conservation areas.

3

In 1998, the Secretary of the Interior made available approximately 87 percent of the 4.6 million acre Northeast NPR-A planning area for oil and gas leasing. The 1998 Record of Decision (NPR-A Northeast, Integrated Activity Plan / Environmental Impact Statement) presented scientific recommendations to conserve wildlife habitat and populations under the scenario of oil and gas development in Northeast NPR-A based on the best available data at the time. The DEIS does not present new biological information published since the 1998 Plan that supports the preferred alternative of BLM (Alternative B), which allows exploration and development in an additional 387,000 acres at Teshekpuk Lake and Colville River. Alternative C offers even less habitat protection than the preferred alternative.

004
Research

Further, BLM has not followed through on the 1998 Record of Decision for a research advisory team to ensure ?monitoring will be undertaken to determine the status of the various resources in the planning area...and to measure the effectiveness of protective measures? (p. 21). This disturbs me because the BLM website for the DEIS (<http://69.20.72.207/nenpra/default.html>) describes the intent of BLM to implement ?performance-based measures? instead of existing ?prescriptive stipulations [which] are very specific and in some cases inappropriately or needlessly restrictive [of development practices].? Performance-based measures are a type of adaptive management that is by its nature a trial-and-error process; without appropriate testing, they could be used to permit less conservative measures for habitat protection until enough time had passed to evaluate problems. I do not believe that present energy needs in the U.S. justify taking such a risk with the rich biological values of NPR-A Northeast.

5

The 9 June 2004 news release announcing the public comment period for the DEIS (<http://www.ak.blm.gov/affairs/press/pr060904.html>) projected a nearly 2.4-fold increased

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savings per year (from \$830 million to \$2 billion) on imported oil if the U.S. were to develop the additional 387,000 acres in Northeast NPR-A. The comparatively nominal cost of demonstrating the validity of performance-based measures through scientific method is well justified before implementing these untested practices in the additional lease area of such demonstrated value as fish and wildlife habitat and a foraging area for local subsistence users. Prescriptive stipulations may be conservative, but they serve a purpose in preventing long-term damage to public resources in light of what is not understood about the potential effects of oil and gas development in the arctic on wildlife habitat and populations. The oil resource will remain in its reservoir for a long time in the future, so it behooves our government to understand effective mitigation measures before proceeding with lease sales in this additional area under Alternative B (preferred alternative) or Alternative C.

6

In conclusion, I support Alternative A (no action) and recommend that performance-based measures for wildlife mitigation be verified as effective by the U.S. Fish and Wildlife Service or a third party before development is allowed in the area protected by the 1998 Record of Decision for Northeast NPR-A. The unique and irreplaceable wildlife and habitat resources in the NE NPR-A must be adequately protected concurrent with any oil exploration and development. I do not have confidence that the proposed performance-based measures would achieve protection without prior demonstration of their effectiveness. BLM should retain the current protection measures afforded by the Teshekpuk Lake Surface Protection Area and the Colville River Special Area.

Tom Paragi

Attached: None